

COHEN & GREEN

May 17, 2022

Hon. Gabriel W. Gorenstein, U.S.M.J.
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

By Electronic Filing.

**Re: In re: New York City Policing During Summer 2020 Demonstrations,
1:20-CV-8924 (CM) (GWG) — This Letter Relates to All Cases**

Dear Judge Gorenstein:

I write regarding the financial portion of the sanction order the Court issued at the conference on April 12, 2022, to confirm the parties have now settled my entitlement to fees as a sanction for Defendants' violation of the Court's orders about the discovery "chart." Consistent with Dkt. No. 317, I sent a draft of this letter more than 24 hours ago, and have not received any response or request for more time to consider the letter.

First, after negotiation, the parties have settled the fee entitlement at \$9,045 with the understanding that at Defendants' request, we removed certain time Defendants believed was not included in the sanctions order, and will not be barred from seeking compensation for those hours later. Consistent with that, the Court should enter a final sanction order against Defendants for this portion of what the Court ordered as sanctions related to the chart on April 12, 2022 of \$9,045, consisting of my hours from March 18 and after, up to the conclusion of the conference.

Second, I ask that the Court to set a date certain for payment — and I would suggest the Court order Defendants complete payment within 45 days of any order on this letter. *Cf.* Dkt. No. 511 (setting 34 days after the order as the time to pay).

Once again, we thank the Court for its continued time and attention.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

COHEN & GREEN P.L.L.C.

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cc:

All relevant parties by electronic filing.